

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BARBARA ROOP,

Plaintiff,

v.

ALLIED INTERSTATE, INC.,

Defendant.

No.: 1:12-cv-03442 (LAP) (DCF)

**DECLARATION OF  
CASEY D. LAFFEY**

**CASEY D. LAFFEY**, pursuant to 28 U.S.C. § 1746, hereby declares:

1. I am an attorney-at-law in the State of New York and am associated with the law firm of Reed Smith LLP, counsel for Allied Interstate LLC f/k/a Allied Interstate, Inc. (hereinafter “Defendant”), in the above-captioned action. I make this Declaration in opposition to the Petition for Attorney’s Fees and Costs filed by Plaintiff Barbara Roop (“Plaintiff”). Specifically, I submit this Declaration to place before the Court true and correct copies of certain documents referenced in the accompanying Memorandum of Law.

2. A true and correct copy of Plaintiff’s Petition for Attorney’s Fees and Costs in this action is annexed hereto as Exhibit “A”.

3. A true and correct copy of the Offer of Judgment in this action is annexed hereto as Exhibit “B”.

4. A true and correct copy of the Notice of Acceptance of the Offer of Judgment in this action is annexed hereto as Exhibit “C”.

5. A screenshot of a page from Plaintiff’s counsel’s website soliciting suits against Defendant by name, taken May 31, 2012, is annexed hereto as Exhibit “D”.

6. A copy of the article entitled "FDCPA Suits Jump in Second Half of January", dated February 16, 2012, in insideARM.com is annexed hereto as Exhibit "E".

7. A true and correct copy of the Complaint in this action is annexed hereto as Exhibit "F".

8. A true and correct copy of Magistrate Judge Peck's joint Opinion and Order in Ryan v. Allied Interstate, Inc., No. 12-CV-0526 (AJP), 2012 WL 3217853 (S.D.N.Y. Aug. 9, 2012) and Henning v. Allied Interstate, Inc., No. 12-CV-1719 (AJP), 2012 WL 3217853 (S.D.N.Y. Aug. 9, 2012) is annexed hereto as Exhibit "G".

9. True and correct copies of representative similar complaints filed by Plaintiff's counsel in the United States District Court for the Southern District of New York are collectively annexed hereto as Exhibit "H".

10. A true and correct copy of the answer in this action is annexed hereto as Exhibit "I".

11. A true and correct copy of Defendant's Notice of Deposition of Plaintiff is annexed hereto as Exhibit "J".

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: New York, New York  
August 27, 2012

  
CASEY D. LAFFEY